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5 Attorney for Defendant,
WILLIAM HAMMAN

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(Hon. Barry Ted Moskowitz)**

16 COMES NOW the plaintiff, United States of America, by and through its counsel,
17 Karen P. Hewitt, United States Attorney, and Sherri W. Hobson, Assistant United States
18 Attorney, and defendants William Hamman, through his counsel Frank J. Ragen; Peter
19 Carlo Mertens, through his counsel, Patrick Q. Hall; Wayne Joseph Fernandes, through
20 his counsel, Dorn G. Bishop; and Bettina Thakore, through her counsel, Lisa J. Damiani,
21 and hereby jointly request the Court continue the Motions Hearing previously scheduled
22 for September 19, 2008, at 2:00 p.m. to December 19, 2008, at 2:00 p.m.

23 This continuance is requested in order for defense counsel to receive the
24 following discovery. The government has agreed to provide (if not already provided):

- 25 (1) the tape recorded meeting at Chili's involving Mahon, Hausotter, and
26 Mertens;
27 (2) taped and/or written statements by Mahon and Hausotter;
28 (3) taped statements by defendants other than Fernandes;

- (4) holding cell taped statements of Mertens, Fernandes, and possibly other defendants; and
- (5) the first session of Hamman's grand jury testimony (which was apparently interrupted).

Counsel need this time to adequately review the above discovery and write the pre-trial motions.

Respectfully submitted,

Dated: September 11, 2008

s/Frank J. Ragen
FRANK J. RAGEN
Attorney for Defendant
WILLIAM HAMMAN
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Dated: September 11, 2008

s/Patrick Q. Hall
PATRICK Q. HALL
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PETER CARLO MERTENS
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Dated: September 11, 2008

s/Dorn G. Bishop
DORN G. BISHOP
Attorney for Defendant
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Dated: September 11, 2008

s/Lisa J. Damiani
LISA J. DAMIANI
Attorney for Defendant
BETTINA THAKORE
Email: LJDamiani@damianilawgroup.com

Dated: September 11, 2008

s/Sherri W. Hobson
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Attorney for Plaintiff
UNITED STATES OF AMERICA
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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(Hon. Barry Ted Moskowitz)**

UNITED STATES OF AMERICA) CASE NO. 08CR0440-BTM
)
Plaintiff,)
)
vs.)
)
PETER CARLO MERTENS, et al.,)
)
Defendants.)

IT IS HEREBY CERTIFIED THAT:

I, LALANYA HAM, am a citizen of the United States and am at least eighteen years of age. My business address is 105 West F Street, Ste. 215, San Diego, California, 92101.

13 I am not a party to the above-entitled action. I hereby certify that I have caused
14 to be served **JOINT MOTION TO CONTINUE MOTIONS HEARING** to the
15 following ECF participants on this case:

Dorn G Bishop
dorn@dornbishoplaw.com,kstarri@yahoo.com

Lisa J Damiani
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Patrick Q Hall
hall@scmy.com, flores@scmy.com

Sherri Walker Hobson
Sherri.Hobson@usdoj.gov,melissa.d.johnson@usdoj.gov,efile.dkt.nes@usdoj.gov

24 I declare under penalty of perjury that the foregoing is true and correct.
25 Executed on September 11, 2008.

Natanya Ham
LALANYA HAM